

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

UNITED STATES)
)
)
 v.)
)
MOHAMMED ABDUL QAYIUM)
QURAISHI, et al.)
)
)

Cr. No. 04-10345-NMG

**ASSENTED-TO MOTION TO IMPOUND DEFENDANTS' OPPOSITION TO THE
GOVERNMENT'S MOTION TO REFUND EXPENSES**

Defendants Mohammed Abdul Aziz Quraishi (“Aziz”) and Mohammed Abdul Qayium Quraishi (“Farees”) (collectively, the “Defendants”) hereby respectfully move this Court for leave to file Defendants’ Opposition to the Government’s Motion to Refund Expenses (“Opposition”) under seal.

In support of this Motion, Defendants state as follows:

1. The Government filed a Motion to Refund Expenses, and the Defendants have opposed that motion, through the underlying Opposition.
2. Defendants’ Opposition contains confidential and sensitive information pertaining to the Defendants. This confidential information is contained within Defendants’ sentencing memoranda, which remain under seal.
3. Defendants represent that the impoundment order may be lifted upon the Court’s disposition of this action, and all impounded materials may be returned to Defendants.
4. The Government, through Assistant U.S. Attorney Kimberly West, assents to the requested relief.

WHEREFORE, Defendants respectfully requests that the Opposition be impounded until further Order of the Court. In addition, Defendants respectfully request that the Court accept the Opposition provisionally under Seal pending the Court's ruling on this Motion.

Respectfully submitted,

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/s/ Laura B. Angelini

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February 27, 2008

LOCAL RULE 7.1 STATEMENT

I hereby certify that counsel for Defendants did confer in good faith with Assistant United States Attorney Kim West in an effort to narrow or resolve the issues raised in this motion.

/s/ Laura B. Angelini
Laura B. Angelini

CERTIFICATE OF SERVICE

I hereby certify that on this 27th day of February, 2008, this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants.

/s/ Laura B. Angelini

Laura B. Angelini